UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

GUCCI AMERICA, INC.,

Plaintiff.

- against -

Civil Action No. 1:07-cv-6820 (RMB) (JCF)

JOINT PRE-TRIAL ORDER

JENNIFER GUCCI, JENCO DESIGNS, LLC, JENNICOR, LLC, JENNY GUCCI COFFEE AND GELATO COMPANY, INC., VERATEX, INC., COLLEZIONE DI CASA, INC., E.L. ERMAN -DEAD SEA COSMETICS CORP., ELE BRANDS ENTERPRISE, INC., GBN WATCH COLLECTION, INC., GBN GLOBAL BUSINESS NETWORK, EDWARD LITWAK d/b/a ED LITWAK & ASSOCIATES, GEMMA GUCCI, GEMMA GUCCI COFFEE AND GELATO COMPANY, INC., ABC CORPORATIONS 1-10, and JOHN DOES 1-10,

Defendants.

Plaintiff Gucci America, Inc. and Defendants Jennifer Gucci, Gemma Gucci and Edward Litwak, d/b/a Ed Litwak and Associates, in accordance with the pre-trial procedures of United States District Judge Richard M. Berman, hereby submit the following Joint Pretrial Order in connection with the above captioned litigation.

T. Counsel for the Parties

A. Counsel for Plaintiff Gucci America, Inc.

By: ARNOLD & PORTER LLP

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John Maltbie (JM 3658)

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B. Counsel for Defendants Jennifer Gucci, Gemma Gucci and Edward Litwak

By: HARRINGTON, OCKO & MONK, LLP

Kevin J. Harrington (KH 5027) John T.A. Rosenthal (JR 4819) 81 Main Street, 2nd Floor White Plains, New York 10601 Telephone: (914) 686-4800 Facsimile: (914) 686-4824

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II. Statement Concerning Subject Matter Jurisdiction

The Court has subject matter jurisdiction under the Lanhan Act, 15 U.S.C.§ 1051 et. seq., 15 U.S.C.§ 1121 and 28 U.S.C.§ 1331, and 28 U.S.C. §§ 2201, 2202.

III. Statement of Plaintiff's Claims

Plaintiff has asserted claims of trademark infringement of its famous Gucci trademarks under 15 U.S.C. § 1114(1)(a); trademark counterfeiting under 15 U.S.C. §§ 1114(1)(a) and 1116; false designation of origin under 15 U.S.C. § 1125(a); trademark dilution under 15 U.S.C. § 1125(c); common law trademark infringement under the common law of the State of New York; unfair competition under the common law of the State of New York; deceptive acts and practices under New York G.B.L. § 349; and trademark dilution under New York G.B.L. § 360.

IV. Statement of Defendants' Defenses and Counterclaims

Defendants Jennifer Gucci, Gemma Gucci and Edward Litwak d/b/a Edward Litwak & Associates ("Defendants") have denied Plaintiff's claims. Defendants maintain that pursuant to the 1988 decision and order of Judge Connor in *Gucci v. Gucci Shops, Inc.*, 688 F. Supp. 916 (S.D.N.Y. 1988), and other case law in the Second Circuit and elsewhere, Defendants Jennifer Gucci and Gemma Gucci are entitled to be involved in the design of various products and in connection with such design activities to use, and license the use of, their names for various products and services, provided that the marketing and/or packaging for such goods and/or

services indicates that the goods or services are designed or approved by Jennifer Gucci or Gemma Gucci, and the marketing and/or packaging materials contain a disclaimer that neither Jennifer Gucci nor Gemma Gucci are affiliated with Plaintiff. Defendants also maintain that they are not using trademarks registered to Gucci in the United States, and that the use of Defendants' sur-names on goods and/or services is not likely to confuse consumers into believing the goods and/or services bearing Defendants' sur-names are associated with or derive from Plaintiff, and that Defendants use of their sur-names on such goods and/or services do not blur or tarnish Plaintiff's marks or reputation, and do not impair the distinctiveness of Plaintiff's marks. Defendants also assert that Plaintiff is precluded from bringing its causes of action under the doctrines of laches and estoppel, as Plaintiff and/or its affiliated entities have known of Defendants' use of their sur-names on products for more than seven (7) years as of the date of the commencement of this action, and that seven (7) years ago, Plaintiff's affiliated entity, Gucci S.p.A., agreed to allow Defendant Gemma Gucci to use her sur-name in the manner now complained of.

V. Statement of Type and Estimated Length of Trial

The case is to be tried without a jury and the parties estimate that 3 trial days are needed.

VI. Statement as to Whether the Parties Consent to Trial By a Magistrate Judge The parties have not consented to trial of the case by a magistrate judge.

VII. **Stipulations of the Parties**

The parties stipulate and agree as to the following:

- 1. The Court has jurisdiction over the parties and the subject matter hereof.
- 2. Gucci is the owner of all right, title and interest in and to, inter alia, the following trademarks and/or service marks which are all registered with the United States Patent and Trademark Office (collectively the "Gucci Trademarks"):

<u>Mark</u>	Reg. No.	Reg. Date	Class(es)
GUCCI	876,292	09/09/69	16, 18, 21, 25
	959,338	05/22/73	14
	972,078	10/30/73	42
	1,093,769	06/20/78	16
	1,140,598	10/21/80	3
	1,168,477	09/08/81	25
	1,169,019	09/15/81	9
	1,168,922	09/15/81	6
	1,200,991	07/13/82	14
	1,202,802	07/27/82	25
	1,321,864	02/26/85	9
	1,340,599	06/11/85	14
GREEN-RED-GREEN STRIPE	1,122,780 1,123,224 1,483,526	07/24/79 07/31/79 04/05/88	18 14 25.
REPEATING GG DESIGN GO GO GO GO	2,680,237	01/28/03	14
	3,072,547	03/28/06	25
	3,072,549	03/28/06	18

- Defendant Jennifer Gucci was married to Paolo Gucci from 1977 until 1995, 4. when Paolo Gucci died.
- 5. Defendant Gemma Gucci is the daughter of Defendant Jennifer Gucci and Paolo Gucci, and was born in 1983.

VIII. Plaintiff's Trial Witnesses

Jonathan Moss

Terilynn Novak

Avi Cohen

Shane Springer

Sandy Cho (by witness statement or by deposition testimony)

Yakov Ergas

Mandy Talbert

Brian Jaffe

Richard Gazlay

John Macaluso

Randy Sizemore

Michael Pino (by subpoena)

Plaintiff further reserves the right to call rebuttal witnesses.

IX. **Defendants' Trial Witnesses**

Jennifer Gucci

Gemma Gucci

Edward Litwak

Joseph Oliveri

X. Plaintiff's Trial Exhibits

Plaintiff's Trial Exhibit list is attached hereto as Exhibit A.

XI. **Defendants' Trial Exhibits**

Defendants' Trial Exhibit list is attached hereto as Exhibit B.

XII. Plaintiff's Deposition Designations

Plaintiff's Deposition Designations are attached hereto as Exhibit C.

Dated: June 17, 2008

ARNOLD & PORTER LLP

By:

Louis S. Ederer (LE 7574) John Maltilie (JM 3658) 399 Park Avenue

New York, New York 10022 Telephone: (212) 715-1000 Attorneys for Plaintiff Gucci America, Inc. HARRINGTON, OCKO & MONK LLP

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Attorneys for Defendants Jennifer Gucci,
Gemma Gucci and Edward Litwak, d/b/a Ed
Litwak & Associates

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

GUCCI AMERICA, INC.,

Plaintiff,

- against -

JENNIFER GUCCI, JENCO DESIGNS, LLC, JENNICOR, LLC, JENNY GUCCI COFFEE AND GELATO COMPANY, INC., VERATEX, INC., COLLEZIONE DI CASA, INC., E.L. ERMAN - DEAD SEA COSMETICS CORP., ELE BRANDS ENTERPRISE, INC., GBN WATCH COLLECTION, INC., GBN GLOBAL BUSINESS NETWORK, EDWARD LITWAK d/b/a ED LITWAK & ASSOCIATES, GEMMA GUCCI, GEMMA GUCCI COFFEE AND GELATO COMPANY, INC., ABC CORPORATIONS 1-10, and JOHN DOES 1-10,

Defendants.

Civil Action No. 07 cv 6820 (RMB) (JCF)

PLAINTIFF GUCCI AMERICA, INC.'S TRIAL EXHIBIT LIST

Plaintiff Gucci America, Inc. ("Gucci") hereby provides the following list of exhibits that Gucci intends to introduce at trial. Gucci reserves the right to introduce the exhibits at trial in any order it sees fit. Gucci further reserves the right to supplement this exhibit list.

Exhibit No.	Description of Exhibit	Deposition Exhibit Reference	Objections
Px. 1	Pacificap Entertainment Holdings, Inc SEC Print-out	Px. 1	
Px. 2	Gemma Global, Inc. Information	Px. 2	
Px. 3	3/3/00 License Agreement between Harrow, Inc. and Flitsch & Bendayan	Px. 3	
Px. 4	Global Home Marketing, Inc SEC Print-out	Px. 4	
Px. 5	Unexecuted Master License Agreement dated 2/2/04 between J. Gucci and E. Litwak & Associates	Px. 6	
Px. 6	Correspondence Re: JG trademarks provided by E. Litwak to Veratex on 5/29/07	Px. 7	
Px. 7	8/18/06 License Agreement between E. Litwak and JG Coffee & Gelato, Inc.	Px. 8	
Px. 8	Marketing sheet for Gemma Gucci Gelato Ice Cream	Px. 9	

Exhibit	Description of Exhibit	<u>Deposition Exhibit</u>	<u>Objections</u>
No. Px. 9	8/3/06 License Agreement between E. Litwak and	Reference	
I A. J	Eccentric Gournet	Px. 10	
Px. 10	Pacificap Entertainment Holdings Gemma Gucci	Px. 11	
	Agreement	1 A. 11	
Px. 11	3/3/00 Correspondence (Showtime) Re: The Gucci	Px. 12	
	Wars		
Px. 12	Gucci Film Project Sheet	Px. 13	
Px. 13	6/7/00 Rights Agreement Re: The Gucci Wars	Px. 14	
Px. 14	Final Judgment in the Paolo Gucci Case	Px. 15	
Px. 15	Opinion and Order in the Paolo Gucci Case	Px. 16	
Px. 16	Modified Final Judgment in Paolo Gucci Case	Px. 17	
Px. 17	Collezione De Casa - Spring Market 2008	Px. 18	
Px. 18	7/9/07 E-mail Internal at Veratex Re: JG rugs	Px. 19	
Px. 19	8/2/07 Old JG materials provided by E. Litwak to	Px. 20	and the second s
	Veratex		
Px. 20	1/19/07 Letter from E. Litwak to A. Cohen Re:	Px. 21	
	Information on Jennifer Gucci		
Px. 21	First Draft of Sub-license Agreement (note: no	Px. 22	
D 00	limitation on right to use JG trademark)		
Px. 22	2/2/07 E-mail - JG Design Wrap Around In Color	Px. 23	
Px. 23	2/5/07 E-mail - Veratex to E. Litwak Re: JG Color	Px. 24	
Px. 24	Label		
PX. 24	3/2/07 E-mail - A. Cohen - Re: JG Front and Back	Px. 26	
Dw 25	Design 20007 F 2011 to 1 to 2 to 2 to 2 to 2 to 2 to 2 to		
Px. 25	8/28/07 E-mail Internal at Veratex Re: New JG	Px. 27	
Px. 26	Packaging Design		
FX. 20	3/30/07 E-mail from M. Yeh to A. Cohen Re: JG Packaging Designs	Px. 28	
Px. 27	4/24/07 E-mail from M. Yeh to A. Cohen Re: JG	n- 20	
1 A. 27	Packaging designs	Px. 29	
Px. 28	Veratex Press Releases	Px. 30	
Px. 29	Invitation to view Collezione Di Casa designed by J.		
* *** **/	Gucci at Veratex New York Showroom, June 19 - 21,	Px. 31	
	2007		
Px. 30	6/11/07 JG Press Release	Px. 32	
Px. 31	6/14 - 6/15/07 E-mails between potential customers	Px. 33	
	and Veratex Re: JG Market Launch	1 A, JJ	
Px. 32	Examples of Louisville Bedding Packaging - In Color	Px. 34	
Px. 33	5/30/07 E-mail from E.L. Erman to A. Cohen Re: JG	Px. 35	
	cosmetics line color photos (no repeating JG)	1 /k. J.J	11.75
Px. 34	5/31/07 E-mail from E.L. Erman to Veratex Re:	Px. 36	
Conception	Cosmetic line for JG in color (w/repeating JG)	± 43.6 m/ 5.4	
Px. 35	2/15/07 E-mail from E. Litwak to B. Jaffe Re: JG	Px. 37	
	Design		
Px. 36	2/21/07 E-mail from E. Litwak to Proportion Fit Re:	Px. 38	
	JG Design		

<u>Exhibit</u> No.	Description of Exhibit	Deposition Exhibit Reference	<u>Objections</u>
Px. 37	3/20/07 E-mail from E. Litwak to B. Jaffe Re: Jenny	Px. 39	
	photo and package designs		
Px. 38	3/6/07 E-mail from E. Litwak to A. Cohen Re: update	Px. 40	
	on numerous JG projects		
Px. 39	4/30/07 E-mail from E. Litwak to A. Cohen Re: JG	Px. 41	
D 40	Mission statement		
Px. 40	6/6/07 E-mail between E. Litwak and A. Cohen Re:	Px. 42	
Px. 41	Status of JG Projects		
PX. 41	5/14/07 E-mail from E.L. Erman to Peach Direct Re:	Px. 45	
Px. 42	Relationship regarding JG Line	3 42	
1 A. 42	5/24/07 E-mail from David to Dale and cc'd to J. Ergas re E.L. Erman meeting follow-up	Px. 46	
Px. 43	5/24/07 E-mail from Phil to J. Ergas forwarding front	D. 47	
1 11, 13	final and 5/24/07 E-mail from Phil to J. Ergas	Px. 47	
	forwarding back final		La de la companya del companya de la companya del companya de la c
Px. 44	5/25/07 E-mail from E.L. Erman to Peach Direct Re:	Px. 48	
	JG Line	FX. 40	
Px. 45	6/7/07 E-mail from E.L. Erman to Veratex Re:	Px. 49	
	Cosmetics line for JG in color (w/repeating JG)	1 1 1 1	
Px. 46	6/6/07 E-mail from E.L. Erman to Veratex Re: JG	Px. 50	
	bath line color photos (w/repeating JG)	171.00	
Px. 47	6/11/07 E-mail from E. Litwak to E.L. Erman Re:	Px. 51	
	Sublicense Approval		
Px. 48	6/5/07 - 6/11/07 E-mails (Group Exhibit) Re: E.L.	Px. 52	
	Erman Sales Efforts (note one e-mail has photos of		
	bath products attached w/ repeating JG)		
Px. 49	5/30/07 E-mail from E.L. Erman to K. Fisher Re:	Px. 53	
	Additional Information regarding Jennifer Gucci		
Px. 50	6/7/07 E-mail from E.L. Erman to Peach Direct Re:	Px. 54	
	JG Bath Line Agreement		
Px. 51	6/26/07 E-mail from E.L. Erman to Peach Direct Re:	Px. 55	
	Invoice		
Px. 52	7/20/07 E-mail from R. Drori (PD) to E.L. Erman Re:	Px. 56	
D 72	PD Withholding Payment		
Px. 53	6/11/07 E-mail from David Elan to Dafna and cc'd to	Px. 57	
D 5 A	J. Ergas re Posters and Flyers for the J. Gucci Show		
Px. 54	7/2/07 E-mail Internal at E.L. Erman Re: List of	Px. 58	
D 55	Distributors		
Px. 55	7/16/07 Print-out of E.L. Erman Website	Px. 59	
Px. 56	7/16/07 Print-out of Alibaba.com Website	Px. 60	
Px. 57	7/13/07 Collezione De Casa and E.L. Erman License	Px. 61	This is a second
Px. 58	Agreement 7/10/07 F moil from F. L. France A. G. L. B. 10	***	
r X. 30	7/10/07 E-mail from E.L. Erman to A. Cohen Re: JG	Px. 62	-
Px. 59	Watch Design in Color	n_	
1 A. J7	7/11/07 E-mail from E.L. Erman to K. Fisher Re: JG watches	Px. 63	
Px. 60		Dv. 64	
IA. UU	7/13/07 Watch License Agreement	Px. 64	

<u>Exhibit</u>	Description of Exhibit	Deposition Exhibit	e kan manuman kan berangan dan berangan berangan berangan berangan berangan berangan berangan berangan beranga
No.		<u>Reference</u>	<u>Objections</u>
Px. 61	JG Watch Designs	Px. 65	
Px. 62	7/12/07 E-mail from E.L. Erman to J. Ergas Re: JG Jewelry	Px. 66	
Px. 63	5/15/07 Master License Agreement	D (0	
Px. 64	3/2/07 E-mail from J. Gucci to A. Cohen Re:	Px. 68 Px. 69	
1 0 ,	Revisions Revisions	PX. 09	And the state of t
Px. 65	Jennifer Gucci linen carrying bag design	Px. 70	
Px. 66	Jennifer Gucci linen cosmetic bag design	Px. 71	
Px. 67	4/10/07 E-mail from J. Gucci to A. Cohen Re:	Px. 72	
	Revisions		
Px. 68	7/24/07 Louisville Bedding Press Release	Px. 73	
Px. 69	Jennifer Gucci design board #196-07	Px. 74	
Px. 70	Jennifer Gucci design board #188-07	Px. 75	
Px. 71	Jennifer Gucci design board #174-07	Px. 76	
Px. 72	Jennifer Gucci design board #218-07	Px. 77	
Px. 73	Jennifer Gucci design board #219-07	Px. 78	
Px. 74	Jennifer Gucci design board #183-07	Px. 79	
Px. 75	5/24/07 E-mail from J. Gucci to A. Cohen Re: J.	Px. 80	
Px. 76	Gucci trip to NY		
Px. 77	6/7/07 Veratex Invitation to JG Market Launch	Px. 81	
1 A. //	Advertisement for viewing of Collezione Di Casa designed by J. Gucci at Veratex New York Showroom,	Px. 82	
	June 19 - 21, 2007; published in Home Furnishings		
	News on June 18, 2007		
Px. 78	2/13/07 E-mail - M. Pino to A. Cohen Re: legal link	Px. 83	
	between Jennifer and GUCCI	1 A. 05	
Px. 79	2/17/07 E-mail - M. Pino to K. Fisher Re: licensing	Px. 84	
Px. 80	3/15/07 E-mail from M. Pino to A. Cohen Re: JG in	Px. 85	
	China		
Px. 81	4/5/07 E-mail from M. Pino to Veratex Re: meeting	Px. 86	
	between Therapedic and Veratex		
Px. 82	4/18/07 E-mail from M. Pino to A. Cohen Re:	Px. 87	
D 02	JG/Therapedic - JG worldwide		
Px. 83	4/26/07 E-mail from M. Pino to A. Cohen Re: JG	Px. 88	
Px. 84	PowerPoint presentation		
FX. 04	5/3/07 E-mail from M. Pino to K. Fisher Re:	Px. 89	
Px. 85	Therapedic has concerns over trademark rights 7/4/07 E-mail from M. Pino to Veratex Re: JG line	D 00	
Px. 86	7/14/07 E-mail from B. Jaffe to Veratex Re: JG line	Px. 90	
1 71 00	questions	Px. 91	Volumenter
Px. 87	Group Exhibits containing Proportion Fit Documents	Px. 92	
	including 1/26/07 Letter from E. Litwak to B. Jaffe Re:	1 A. 72	
	Proportion Fit Agreement		nana nana
Px. 88	New York Times article titled "Paolo Gucci Jailed for	Px. 93	
	Not Paying Support," dated April 7, 1994.		

Exhibit			
No.	<u>Description of Exhibit</u>	Deposition Exhibit Reference	Objections
Px. 89	New York Times article titled "Paolo Gucci, 64,	Px. 94	
	Prestigious, if Litigious, Designer.		
Px. 90	USPTO File Wrapper for Application No. 75446501	Px. 95	
Px. 91	USPTO File Wrapper for Application No. 75446502	Px. 96	
Px. 92	USPTO File Wrapper for Application No. 76/228124	Px. 97	
Px. 93	J. Gucci USPTO Affidavit (App. No. 76/228124)	Px. 98	
Px. 94	Attorney Position Letter to USPTO (Application No. 76/228124)	Px. 99	
Px. 95	2/28/07 E-mail from J. Gucci to A. Cohen Re: JG Package	Px. 100	
Px. 96	7/26/07 E-mail from Shane Springer to A. Cohen re Gucci Pillow Tags	Px. 103	
Px. 97	6/11/07 E-mail from Sandy to M. Pino re Gucci Preview	Px. 104	
Px. 98	8/6/07 E-mail Internal at Veratex Re: Gucci pricing	Px. 105	
Px. 99	6/8/07 E-mail from S. Springer to A. Cohen re J. Gucci - Veratex Invite	Px. 106	
Px. 100	7/4/07 E-mail from D. Elan to Dale re J. Gucci Agreement	Px. 107	
Px. 101	6/19/07 E-mail from Daphna to David re logo of Jennifer Gucci	Px. 108	
Px. 102	6/19 - 6/21 Market Launch Summary of Meetings	Px. 109	
Px. 103	5/24/07 E-mail from A. Cohen to D. Talbert re Gucci Bedding	Px. 110	
Px. 104	6/12/07 E-mail from M. Pino to Dale listing meeting attendees	Px. 111	
Px. 105	4/23/07 E-mail from M. Pino to A. Cohen Re: Therapedic excited about JG line	Px. 112	
Px. 106	5/24/07 E-mail from M. Pino to D. Talbert re Artwork Boards	Px. 113	
Px. 107	5/21/07 E-mail from M. Pino to K. Fisher Re: Therapedic needs agreement and wants to move forward	Px. 114	
Px. 108	5/28/07 E-mail from M. Pino to RKF re Draft Agreement	Px. 115	
Px. 109	6/6/07 E-mail from M. Pino to Veratex Re: JG International Efforts	Px. 116	
Px. 110	6/10/07 E-mail from M. Pino to D. Talbert re NY	Px. 117	
Px. 111	D. Talbert/M. Pino J. Gucci Topics for Discussion during Launch June 19-21 st , dated 6/16/07	Px. 118	
Px. 112	6/24/07 E-mail from M. Pino to Veratex Re: JG Meeting Summary	Px. 119	
Px. 113	6/25/07 E-mail from M. Pino to Veratex Re: JG Trademarks	Px. 120	
Px. 114	7/2/07 E-mail from M. Pino to Veratex Re: JG Samples for Australia	Px. 121	

Exhibit No.	Description of Exhibit	Deposition Exhibit Reference	<u>Objections</u>
Px. 115	7/3/07 E-mail from M. Pino to Veratex Re: Veratex	Px. 122	
	Commission and Royalty Agreement		
Px. 116	7/10/07 E-mail from M. Pino to A. Cohen Re: JG	Px. 123	
Px. 117	7/22/07 E-mail from M. Pino to D. Talbert re	Px. 124	
D 110	Trademark Guidelines		
Px. 118	8/2/07 E-mail from Veratex to M. Pino Re: JG	Px. 125	
Px. 119	Trademarking		
FX. 119	8/14/07 E-mail from M. Pino to K. Fisher (copy to A.	Px. 126	
Px. 120	Cohen) Re: Battle with Gucci		
FX. 120	6/11/07 E-mail from K. Fisher to E. Litwak and A.	Px. 127	
Px. 121	Cohen Re: Final JG License Agreement	D 150	
1 3. 121	3/16/07 E-mail from Greece Company to A. Cohen Re: Interest in JG Line	Px. 128	
Px. 122		7 100	
1 A. 1242	6/8/07 E-mail from M. Stein (Crestmont) to Veratex Re: JG license for drapery	Px. 129	Transaction of the Control of the Co
Px. 123	6/7/07 E-mail from Fairmont Designs to A. Cohen Re:	D 120	
1 A. 123	JG Furniture	Px. 130	
Px. 124	3/20/07 E-mail from Dale to A. Cohen re Louisville	Px. 131	
	Bedding Co. Samples Sent	rx. 131	
Px. 125	3/6/07 E-mail from A. Cohen to M. Pino re J. Gucci	Px. 133	
	Fold Foil Instructions	FX. 133	
Px. 126	2/15/07 Letter from M. Pino to G. MacNamara re	Px. 134	
	Gucci bedding potential	1 A, 154	
Px. 127	3/19/07 E-mail from A. Cohen to M. Pino re J. Gucci	Px. 135	
	in China		
Px. 128	4/5/07 Letter from J. Jia to Mattress Resources (attn:	Px. 136	
	D. Nelson) re Supply to China		
Px. 129	4/5/07 Veratex/Therapedic Meeting Agenda	Px. 137	
Px. 130	5/3/07 Letter from M. Pino to D. Talbert re Brand	Px. 138	
	Awareness		
Px. 131	5/3/07 E-mail from M. Pino to RKF re Legal Judgment	Px. 139	
Px. 133	5/31/07 Letter from S. Cho to M. Pino enclosing CD's	Px. 140	
	with bed top patterns		
Px. 134	6/4/07 Letter from M. Pino to P. Watt enclosing CD's	Px. 141	
D 105	with Gucci Artwork		
Px. 135	6/6/07 E-mail from Jeffrey to M. Pino re Banners	Px. 142	
Px. 136	6/6/07 E-mail from M. Pino to G. Sammons re Follow	Px. 143	
D- 107	Up		
Px. 137	Cross-Marketing pamphlet titled "Jennifer Gucci -	Px. 144	
D., 120	Collezione Di Casa"		
Px. 138	6/16/07 table titled J. Gucci Topics for Discussion	Px. 145	
D 120	During Launch June 19-21 st		
Px. 139	6/6/07 E-mail from M. Pino to D. Talbert re	Px. 146	
Dv. 140	international and domestic markets		
Px. 140	Undated Sublicense Agreement between Collezione de	Px. 147	meroupho a .
	Casa, Inc. and Sublicensee		alice of the sanda

Exhibit			
No.	<u>Description of Exhibit</u>	Deposition Exhibit Reference	Objections
Px. 141	6/14/07 E-mail from M. Pino to G. MacNamara and B.	Px. 148	
	Roberts re J. Gucci		
Px. 142	6/21/07 E-mail from M. Pino to B. Roberts re AGM &	Px. 149	
Px. 143	Sales Meeting July 2007		
Px. 143	6/25/07 E-mail from M. Pino to D. Nelson re Gucci	Px. 150	
1 A. 144	6/25/07 E-mail from M. Pino to D. Talbert re Trademarks	Px. 151	
Px. 145	June 26, 2007 E-mail from M. Pino to G. Sammons re	D 150	
	License Agreement Changes	Px. 152	www.
Px. 146	July 3, 2007 E-mail from G. Sammons to M. Pino re	Px. 153	
	Representative Agreement	1 X. 1.73	
Px. 147	8/2/07 E-mail from M. Pino to K. Fisher, A. Cohen and	Px. 154	
	D. Talbert re JG Trademarking	***************************************	***************************************
Px. 148	8/13/07 E-mail from A. Cohen to D. Talbert re J. Gucci	Px. 155	
Px. 149	8/14/07 E-mail from M. Pino to K. Fisher re Update	Px. 156	
	and Hotel/Motel		
Px. 150	10/30/07 E-mail from M. Pino to D. Nelson re Gucci	Px. 157	
Px. 151	5/8/07 E-mail from today marketing to M. Pino re	Px. 158	
Px. 152	Interzum Exhibition		
FX. 152	6/11/07 E-mail from S. Cho to M. Pino re Gucci Preview	Px. 159	
Px. 153			
Px. 154	6/28/07 E-mail from N. Sia Meng to M. Pino re Patents 9/12/07 E-mail from H. Guen Moon to M. Pino re Los	Px. 160	
130.10	Angeles Hotel	Px. 161	
Px. 155	10/30/07 E-mail from M. Pino to D. Nelson re Gucci	Px. 162	
Px. 156	Undated J. Gucci cosmetic product sheet showing four	Px. 163	
	collections	1 A. 105	
Px. 157	Photographs of J. Gucci bedding products	Px. 164	
Px. 158	8/8/06 Joint Venture Agreement between Capri Films	Px. 165	
	and Television and the Film Capital Partners Ltd.		
Px. 159	11/29/06 Assignment Agreement between E. Litwak,	Px. 166	
D 160	Capri Films and Lorimont Productions		770
Px. 160	Agreement between J. Gucci concerning the book <i>The</i>	Px. 167	
Px. 161	Gucci Wars		
Px. 162	The Gucci Wars By J. Gucci	Px. 168	
1 A. 102	Draft Agreement between Gigapix Studios and J. Gucci	Px. 169	1
Px. 163	Proposal for the Forgotten Gucci Cookbook	D. 170	
Px. 164	Gemma Gucci International Sheet	Px. 170	
Px. 165	Rebel Gucci Sheet	Px. 171	
Px. 166	Rebel Gucci With G. Gucci Sheet	Px. 172 Px. 173	
Px. 167	M IOP IOF 1	Px. 174	
	We, Women's Entertainment	A 28. I / T	
Px. 168		Px. 175	
	Entertainment to BCII Production		manual characters and the characters are characters and the characters are charac
Px. 169	Rebel Gucci Revenue Projections	Px. 176	¥

Px. 170 12/2/05 e-mail between J. Shields and E. Litwak concerning Rebel Gucci Budget Px. 171 7/18/05 e-mail between E. Litwak and G. Gucci Px. 178 regarding wine Px. 172 7/21/05 e-mail from E. Litwak to G. Gucci regarding wine Px. 173 11/17/06 e-mail from E. Litwak to G. Gucci regarding Px. 179 Px. 173 11/17/06 e-mail from E. Litwak to G. Gucci regarding Px. 180 Samples Px. 174 11/17/06 e-mail from G. Gucci to E. Litwak regarding Px. 181 Samples Px. 175 1/15/07 e-mail from G. Gucci to E. Litwak regarding Px. 182 Px. 176 1/31/07 e-mail from G. Gucci to E. Litwak regarding Px. 183 Px. 176 1/31/07 e-mail from G. Gucci to E. Litwak regarding Px. 183 Px. 176 1/31/07 e-mail from G. Gucci to E. Litwak regarding Px. 184 Px. 187 Px. 179 11/19/07 e-mail from G. Gucci to E. Litwak regarding Px. 186 Px. 187 Px. 188 Px. 189 Px. 180 Px. 180 Px. 180 Px. 180 Px. 180 Px. 181 Px. 181 Px. 181 Px. 181 Px. 181 Px. 182 Px. 184 Px. 182 Px. 184 Px. 185 Px. 185 Px. 186 Px. 186 Px. 186 Px. 186 Px. 186 Px. 187 Px. 188 Px. 189 Px. 182 Px. 184 Px. 185 Px. 185 Px. 185 Px. 186 Px. 186 Px. 186 Px. 186 Px. 187 Px. 188 Px. 189 Px. 184 Px. 189 Px. 185 Px. 190 Px. 184 Px. 185 Px. 190 Px. 186 Px. 190 Px. 186 Px. 190 Px. 187 Px. 191 Px. 191 Px. 193 Px. 194 Px. 195 Px. 196 Px. 197 Px. 197 Px. 198 Px. 199 Px. 199 Px. 191 Px. 194 Px. 195 Px. 196 Px. 196 Px. 196 Px. 197 Px. 197 Px. 197 Px. 198 Px. 190 Px. 191 Px. 191 Px. 191 Px. 191 Px. 192 Px. 194 Px. 195 Px. 196 Px. 196 Px. 200 Px. 201 Px. 201 Px. 201 Px. 201 Px. 202 Px. 204 Px.	Exhibit		Deposition Exhibit	
Px. 170 12.2/05 e-mail between E. Litwak and G. Gucci Px. 177 17.8/05 e-mail between E. Litwak and G. Gucci Px. 178 17.18/05 e-mail between E. Litwak and G. Gucci Px. 178 17.2/105 e-mail from E. Litwak to G. Gucci regarding wine Px. 173 11/17/06 e-mail from E. Litwak to G. Gucci regarding wine Px. 173 11/17/06 e-mail from E. Litwak to G. Gucci regarding Px. 180 11/17/06 e-mail from G. Gucci to E. Litwak regarding Px. 181 samples 17.5/07 e-mail from G. Gucci to E. Litwak regarding Px. 182 handbags Px. 176 17.3/07 e-mail from G. Gucci to E. Litwak regarding Px. 182 handbags Px. 176 17.3/07 e-mail from G. Gucci to E. Litwak regarding Px. 183 Px. 177 6/11/07 e-mail from E. Litwak to G. Gucci regarding Px. 184 4/10/07 e-mail from G. Gucci to E. Litwak regarding Px. 185 Px. 178 Handbag photographs Px. 185 Px. 189 11/19/07 e-mail from G. Gucci to E. Litwak regarding Px. 186 Px. 187 Px. 189 11/19/07 e-mail from G. Gucci to E. Litwak regarding Px. 186 Px. 181 11/19/07 e-mail from G. Gucci to E. Litwak regarding Px. 187 Px. 180 2/17/04 License Agreement between Harrow Px. 187 Enterprises and Renaissance Corp. Px. 188 4/21/05 Letter from E. Litwak to Renaissance Corp. Px. 188 4/21/05 Letter from E. Litwak to R. Gazlay regarding Px. 191 4/21/05 Letter from E. Litwak to R. Gazlay regarding Px. 191 G. Gucci wines Px. 194 G. Gucci wines Px. 194 G. Gucci wines Px. 195 Px. 196 Px. 197 Px. 198 Ry. 196 G. Gucci wines Px. 196 Px. 197 Px. 197 Px. 198 Ry. 196 Px. 196 Px. 197 Px. 197 Px. 198 Px. 190 CD containing G. Gucci ce crean news story Px. 197 Px. 198 CD containing G. Gucci ce crean news story Px. 196 Px. 190 Px. 200 Px. 190 Px. 201 Px. 201 Px. 201 Px. 202 Px. 190 Px. 202 Px. 190 Px. 204 Px. 204	The second secon	<u>Description of Exhibit</u>		Objections
Px. 171 7/18/05 e-mail between E. Litwak and G. Gucci Px. 172 7/21/05 e-mail from E. Litwak to G. Gucci regarding wine Px. 173 11/17/06 e-mail from E. Litwak to G. Gucci regarding samples Px. 174 11/17/06 e-mail from G. Gucci to E. Litwak regarding samples Px. 175 11/15/07 e-mail from G. Gucci to E. Litwak regarding samples Px. 175 1/15/07 e-mail from G. Gucci to E. Litwak regarding handbags Px. 176 1/31/07 e-mail from G. Gucci to E. Litwak regarding handbags Px. 177 6/11/07 e-mail from E. Litwak to G. Gucci regarding handbags Px. 178 11/19/07 e-mail from G. Gucci to E. Litwak regarding handbags Px. 179 11/19/07 e-mail from G. Gucci to E. Litwak regarding Px. 186 Px. 179 11/19/07 e-mail from G. Gucci to E. Litwak regarding Px. 180 Px. 180 21/17/04 License Agreement between Harrow Enterprises and Renaissance Corp. Px. 181 4/21/05 letter from E. Litwak to Renaissance Corp. Px. 182 9/28/05 License Agreement between E. Litwak & Px. 189 Px. 184 3/20/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 185 Px. 186 Px. 187 Rx. 186 Px. 187 Rx. 187 Rx. 187 Rx. 187 Rx. 188 Rx. 189 Rx. 180 Rx. 180 Rx. 180 Rx. 181 Rx. 182 Rx. 183 Rx. 184 Rx. 184 Rx. 185 Rx. 185 Rx. 186 Rx. 187 Rx. 188 Rx. 189 Rx. 180 Rx. 180 Rx. 181 Rx. 185 Rx. 180 Rx. 181 Rx. 185 Rx. 180 Rx. 181 Rx. 182 Rx. 183 Rx. 184 Rx. 184 Rx. 184 Rx. 185 Rx. 185 Rx. 186 Rx. 187 Rx. 188 Rx. 189 Rx. 189 Rx. 189 Rx. 180 Rx. 180 Rx. 181 Rx. 181 Rx. 181 Rx. 181 Rx. 182 Rx. 183 Rx. 184	Px. 170	12/2/05 e-mail between J. Shields and E. Litwak		
regarding wine Px. 172		concerning Rebel Gucci Budget		
Px. 172	Px. 171		Px. 178	
wine Px. 173	D 150			
Px. 173	PX. 172	7/21/05 e-mail from E. Litwak to G. Gucci regarding	Px. 179	
Samples 11/17/06 e-mail from G. Gucci to E. Litwak regarding 17. 180	D 172			
Px. 174	FX. 1/3	11/1 //06 e-mail from E. Litwak to G. Gucci regarding	Px. 180	
Samples 1/15/07 e-mail from G. Gucci to E. Litwak regarding handbags Px. 182 1/31/07 e-mail from G. Gucci to E. Litwak regarding handbags Px. 177 1/31/07 e-mail from G. Gucci to E. Litwak regarding handbags Px. 177 6/11/07 e-mail from E. Litwak to G. Gucci regarding various Px. 178 Handbag photographs Px. 185 Px. 179 11/19/07 e-mail from G. Gucci to E. Litwak regarding phoenix Fashion Show Px. 180 2/17/04 License Agreement between Harrow Px. 187 Enterprises and Renaissance Corp. Px. 188 Px. 189 4/21/05 letter from E. Litwak to Renaissance Corp. Px. 188 Px. 189 4/21/05 letter from E. Litwak to Renaissance Corp. Px. 189 Px. 180 Px. 180 Px. 180 Px. 180 Px. 181 Photographs of G. Gucci Wines Px. 184 Associates and G. Gucci Wines Px. 184 Associates and G. Gucci wine bottles Px. 184 Photographs of G. Gucci wine bottles Px. 185 Px. 184 4/24/07 e-mail from E. Litwak to R. Gazlay regarding Px. 191 G. Gucci wines Px. 186 4/24/07 e-mail from E. Litwak to R. Gazlay regarding Px. 193 G. Gucci wines Px. 187 8/24/07 e-mail from E. Litwak to R. Gazlay regarding Px. 193 G. Gucci wines Px. 189 G. Gucci wines Px. 189 G. Gucci wines Px. 190 Px. 191 1/14/07 e-mail from E. Litwak to R. Gazlay regarding Px. 194 G. Gucci wines Px. 195 Px. 196 Px. 196 Px. 197 Px. 191 1/14/07 e-mail from E. Litwak to G. Gucci regarding Px. 196 Px. 197 Px. 191 1/14/07 e-mail from E. Litwak to G. Gucci regarding Px. 198 Illiance Px. 199 Px. 199 Px. 199 Px. 190 Px. 200 Px. 190 Px. 200 Px. 190 Px. 200 Px. 200 Px. 200 Px. 200 Px. 200	Pv 174			
Px. 175	1 3. 1/7	samples	Px. 181	
handbags 17.3 1/07 e-mail from G. Gucci to E. Litwak regarding handbags Px. 177 6/11/07 e-mail from E. Litwak to G. Gucci regarding various Px. 178 Handbag photographs Px. 178 Handbag photographs Px. 179 11/19/07 e-mail from G. Gucci to E. Litwak regarding Phoenix Fashion Show Px. 180 2/17/04 License Agreement between Harrow Px. 187 Px. 181 4/21/05 letter from E. Litwak to Renaissance Corp. Px. 188 Px. 182 9/28/05 License Agreement between E. Litwak & Px. 189 Px. 184 4/21/05 letter from E. Litwak to Renaissance Corp. Px. 188 Px. 182 9/28/05 License Agreement between E. Litwak & Px. 189 Px. 184 3/20/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 191 G. Gucci wines Px. 191 G. Gucci wines Px. 185 4/13/07 letter from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 186 4/24/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 187 8/24/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 189 G. Gucci wines Px. 194 G. Gucci wines Px. 189 G. Gucci wines Px. 194 G. Gucci wines Px. 195 Px. 189 G. Gucci wines Px. 196 Px. 197 Px. 191 11/14/07 e-mail from E. Litwak to G. Gucci regarding Px. 191 11/14/07 letter from E. Litwak to G. Gucci regarding Px. 192 Px. 193 11/14/07 letter from E. Litwak to G. Gucci regarding Px. 194 11/14/07 letter from E. Litwak to G. Gucci regarding Px. 198 Px. 199 Px. 191 11/14/07 letter from E. Litwak to G. Gucci regarding Px. 198 11/14/07 letter from E. Litwak to G. Gucci Coffee Px. 200 Px. 194 11/5/05 Scope of Service document for G. Gucci Coffee Px. 201 Px. 194 11/5/05 Scope of Service document for G. Gucci Coffee Px. 202 Px. 195 Arizona corporation status sheet for Segreto By Jen Px. 204 Px. 204 Px. 204 Px. 204 Px. 205 Px. 204 Px. 206 Px. 207 P	Px 175		B 466	
Px. 176	1.1.175	handhaos	Px. 182	
handbags Px. 177 6/11/07 e-mail from E. Litwak to G. Gucci regarding various Px. 184 Px. 178 Handbag photographs Px. 185 Px. 179 11/19/07 e-mail from G. Gucci to E. Litwak regarding Phoenix Fashion Show Px. 180 2/17/04 License Agreement between Harrow Px. 187 Px. 180 2/17/04 License Agreement between Harrow Px. 187 Px. 181 4/21/05 letter from E. Litwak to Renaissance Corp. Px. 188 Px. 182 9/28/05 License Agreement between E. Litwak & Px. 189 Associates and G. Gucci Wines Px. 189 Associates and G. Gucci Wines Px. 190 Px. 183 Photographs of G. Gucci wine bottles Px. 190 Px. 184 3/20/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 191 Px. 185 4/13/07 letter from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 193 Px. 186 4/24/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 193 Px. 187 8/24/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 194 Px. 189 G. Gucci wines Px. 194 G. Gucci wines Px. 189 G. Gucci wines Px. 195 Px. 180 G. Gucci wine business expense sheet as of 9/30/07 Px. 195 Px. 181 G. Gucci ice cream labels Px. 196 Px. 191 11/14/07 e-mail from E. Litwak to G. Gucci regarding licensing Px. 198 Px. 192 11/14/07 e-mail from E. Litwak to DeRiera Corporation Px. 198 Px. 193 2/16/06 letter from E. Litwak to DeRiera Corporation Px. 200 Px. 194 1/5/05 Scope of Service document for G. Gucci Coffee Px. 201 Px. 195 Statement of work for G. Gucci Coffee and Gelato Px. 202 Px. 196 Arizona corporation status sheet for Segreto By Jen Px. 204 Px. 197 Arizona corporation status sheet for Segreto By Jen Px. 204 Px. 204 Px. 204 P	Px. 176		D ₁₁ 102	
Px. 177 6/11/07 e-mail from E. Litwak to G. Gucci regarding various Px. 185 Px. 179 Handbag photographs Px. 185 Px. 179 11/19/07 e-mail from G. Gucci to E. Litwak regarding Phoenix Fashion Show Px. 186 Px. 180 2/17/04 License Agreement between Harrow Enterprises and Renaissance Corp. Px. 187 Px. 181 4/21/05 letter from E. Litwak to Renaissance Corp. Px. 188 Px. 182 9/28/05 License Agreement between E. Litwak & Px. 189 Px. 189 Px. 183 Photographs of G. Gucci Wines Px. 190 Px. 184 3/20/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 191 Px. 185 4/13/07 letter from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 193 Px. 186 4/24/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 193 Px. 187 8/24/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 194 Px. 188 G. Gucci ice cream labels Px. 196 Px. 189 G. Gucci ice cream labels Px. 197 Px. 191 11/14/07 e-mail from E. Litwak to DeRiera Corporation Px. 198 Px. 198 Px. 192 11/14/07 e-mail from E. Litwak to DeRiera Co		handbags	PX. 183	
Px. 178 Handbag photographs Px. 179 11/19/07 e-mail from G. Gucci to E. Litwak regarding Phoenix Fashion Show Px. 180 2/17/04 License Agreement between Harrow Enterprises and Renaissance Corp. Px. 181 4/21/05 letter from E. Litwak to Renaissance Corp. Px. 182 9/28/05 License Agreement between E. Litwak & Px. 189 Associates and G. Gucci Wines Px. 183 Photographs of G. Gucci wine bottles Px. 184 3/20/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 185 4/13/07 letter from E. Litwak to G. Gucci Wines Px. 186 4/24/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 187 8/24/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 188 G. Gucci wines Px. 189 G. Gucci ivine business expense sheet as of 9/30/07 Px. 195 Px. 189 G. Gucci ic cream labels Px. 190 CD containing G. Gucci ic cream news story Px. 191 11/14/07 e-mail from E. Litwak to G. Gucci regarding Px. 196 Px. 191 11/14/07 letter from E. Litwak to G. Gucci regarding Px. 197 Px. 191 11/14/07 letter from E. Litwak to G. Gucci regarding Px. 198 Ilicensing Px. 192 11/14/07 letter from E. Litwak to G. Gucci regarding Px. 198 Ilicensing Px. 193 2/16/06 letter from E. Litwak to DeRiera Corporation Px. 199 Px. 194 1/5/05 Scope of Service document for G. Gucci Coffee and Gelato Px. 200 Px. 195 Statement of work for G. Gucci Coffee and Gelato Px. 202 Px. 196 Arizona corporation status sheet for Segreto By Jen Gucci LLC	Px. 177	···	Dv 194	
Px. 179 11/19/07 e-mail from G. Gucci to E. Litwak regarding Phoenix Fashion Show Px. 180 2/17/04 License Agreement between Harrow Enterprises and Renaissance Corp. Px. 181 4/21/05 letter from E. Litwak to Renaissance Corp. Px. 182 9/28/05 License Agreement between E. Litwak & Px. 189 Associates and G. Gucci Wines Px. 183 Photographs of G. Gucci wine bottles Px. 184 3/20/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 185 4/13/07 letter from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 186 4/24/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 187 8/24/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 189 Px. 189 G. Gucci wines Px. 190 CD containing G. Gucci ice cream labels Px. 190 Px. 191 1/1/4/07 e-mail from E. Litwak to G. Gucci regarding Px. 190 1/1/4/07 e-mail from E. Litwak to G. Gucci regarding Px. 190 Px. 191 1/1/4/07 e-mail from E. Litwak to G. Gucci regarding Px. 192 Px. 194 1/1/4/07 e-mail from E. Litwak to G. Gucci regarding Px. 195 Px. 196 Px. 197 Px. 191 1/1/4/07 e-mail from E. Litwak to G. Gucci regarding Px. 198 1/1/4/07 e-mail from E. Litwak to G. Gucci regarding Px. 199 1/1/4/07 e-mail from E. Litwak to DeRiera Corporation Px. 199 Px. 194 1/5/05 Scope of Service document for G. Gucci Coffee and Gelato Px. 195 Statement of work for G. Gucci Coffee and Gelato Px. 200 Px. 196 Arizona corporation status sheet for Segreto By Jen Gucci LLC		various various	1 A. 10-4	
Px. 179 11/19/07 e-mail from G. Gucci to E. Litwak regarding Px. 186 Phoenix Fashion Show Px. 180 2/17/04 License Agreement between Harrow Enterprises and Renaissance Corp. Px. 187 Px. 181 4/21/05 letter from E. Litwak to Renaissance Corp. Px. 188 Px. 182 9/28/05 License Agreement between E. Litwak & Associates and G. Gucci Wines Px. 183 Photographs of G. Gucci wine bottles Px. 190 Px. 184 3/20/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 185 4/13/07 letter from E. Litwak to G. Gucci Wines Px. 192 Px. 186 4/24/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 187 8/24/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 188 G. Gucci Wine Business expense sheet as of 9/30/07 Px. 194 Px. 189 G. Gucci ice cream labels Px. 196 Px. 190 CD containing G. Gucci ice cream news story Px. 197 Px. 191 11/14/07 letter from E. Litwak to G. Gucci regarding licensing Px. 192 11/14/07 letter from E. Litwak to DeRiera Corporation Px. 199 Px. 193 2/16/06 letter from E. Litwak to San Long International Px. 200 Px. 194 1/5/05 Scope of Service document for G. Gucci Coffee and Gelato Px. 202 Px. 195 Statement of work for G. Gucci Coffee and Gelato Px. 203 Px. 197 Arizona corporation status sheet for Segreto By Jen Px. 204	Px. 178	Handbag photographs	Px 185	
Px. 180	Px. 179	11/19/07 e-mail from G. Gucci to E. Litwak regarding		
Enterprises and Renaissance Corp. Px. 181		Phoenix Fashion Show	13	La constant de la con
Enterprises and Renaissance Corp. Px. 181 4/21/05 letter from E. Litwak to Renaissance Corp. Px. 182 9/28/05 License Agreement between E. Litwak & Px. 189 Associates and G. Gucci Wines Px. 183 Photographs of G. Gucci wine bottles Px. 184 3/20/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 185 4/13/07 letter from E. Litwak to G. Gucci Wines Px. 186 4/24/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 187 8/24/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 188 G. Gucci wines Px. 189 G. Gucci Wine business expense sheet as of 9/30/07 Px. 195 Px. 189 G. Gucci ice cream labels Px. 190 CD containing G. Gucci ice cream news story Px. 191 11/14/07 e-mail from E. Litwak to G. Gucci regarding licensing Px. 192 11/14/07 letter from E. Litwak to G. Gucci regarding Px. 198 Px. 193 2/16/06 letter from E. Litwak to DeRiera Corporation Px. 194 1/5/05 Scope of Service document for G. Gucci Coffee and Gelato Px. 195 Px. 201 Px. 196 Px. 203 Px. 197 Arizona corporation status sheet for Segreto By Jen Gucci LLC	Px. 180	2/17/04 License Agreement between Harrow	Px. 187	
Px. 182 9/28/05 License Agreement between E. Litwak & Associates and G. Gucci Wines Px. 183 Photographs of G. Gucci wine bottles Px. 184 3/20/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 185 4/13/07 letter from E. Litwak to G. Gucci Wines Px. 186 4/24/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 187 8/24/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 188 G. Gucci Wine business expense sheet as of 9/30/07 Px. 195 Px. 189 G. Gucci ice cream labels Px. 190 CD containing G. Gucci ice cream news story Px. 191 11/14/07 e-mail from E. Litwak to DeRiera Corporation Px. 192 11/14/07 letter from E. Litwak to DeRiera Corporation Px. 193 2/16/06 letter from E. Litwak to San Long International Px. 194 175/05 Scope of Service document for G. Gucci Coffee and Gelato Px. 195 Statement of work for G. Gucci Coffee and Gelato Px. 196 Arizona corporation status sheet for Segreto By Jen Gucci LLC Px. 203 Px. 204		Enterprises and Renaissance Corp.		
Associates and G. Gucci Wines Px. 183 Photographs of G. Gucci wine bottles Px. 190 Px. 184 3/20/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 185 4/13/07 letter from E. Litwak to G. Gucci Wines Px. 192 Px. 186 4/24/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 187 8/24/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 188 G. Gucci wines Px. 189 G. Gucci wine business expense sheet as of 9/30/07 Px. 195 Px. 189 G. Gucci ice cream labels Px. 196 Px. 190 CD containing G. Gucci ice cream news story Px. 197 Px. 191 11/14/07 e-mail from E. Litwak to G. Gucci regarding licensing Px. 192 11/14/07 letter from E. Litwak to DeRiera Corporation Px. 199 Px. 193 2/16/06 letter from E. Litwak to San Long International Px. 200 Px. 194 17/5/05 Scope of Service document for G. Gucci Coffee and Gelato Px. 195 Statement of work for G. Gucci Coffee and Gelato Px. 202 Px. 196 Arizona corporation status sheet for Segreto By Jen Gucci LLC Px. 204		4/21/05 letter from E. Litwak to Renaissance Corp.	Px. 188	
Px. 183 Photographs of G. Gucci wine bottles Px. 184 3/20/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 185 4/13/07 letter from E. Litwak to G. Gucci Wines Px. 186 4/24/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 187 8/24/07 e-mail from E. Litwak to R. Gazlay regarding G. Gucci wines Px. 188 G. Gucci Wine business expense sheet as of 9/30/07 Px. 195 Px. 189 G. Gucci ice cream labels Px. 190 CD containing G. Gucci ice cream news story Px. 191 11/14/07 e-mail from E. Litwak to G. Gucci regarding licensing Px. 192 11/14/07 letter from E. Litwak to DeRiera Corporation Px. 193 2/16/06 letter from E. Litwak to DeRiera Corporation Px. 194 1/5/05 Scope of Service document for G. Gucci Coffee and Gelato Px. 195 Statement of work for G. Gucci Coffee and Gelato Px. 196 Arizona corporation status sheet for Segreto By Jen Gucci LLC Px. 204	Px. 182	9/28/05 License Agreement between E. Litwak &	Px. 189	
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Exhibit		Deposition Exhibit	
<u>No.</u>	<u>Description of Exhibit</u>	Reference	Objections
Px. 199	Veratex graphic designs regarding J. Gucci products	Px. 206	m-kitora: 2024; (1707; 232; 2300) (2007; (1707)
Px. 200	Veratex graphic designs regarding J. Gucci products	Px. 207	
Px. 201	Veratex graphic designs regarding J. Gucci products	Px. 208	
Px. 202	Veratex graphic designs regarding J. Gucci products	Px. 209	
Px. 203	Group exhibit of materials provided by E. Litwak to	Px. 210	
	Veratex regarding J. Gucci		
Px. 204	Photograph of GUCCI Repeating GG Design	Px. 25	
Px. 205	Photograph of GUCCI Word Mark		
Px. 206	Certified Copy of GUCCI Trademark Registration Number 876,292		
Px. 207	Certified Copy of GUCCI Trademark Registration Number 959,338		
Px. 208	Certified Copy of GUCCI Trademark Registration Number 972,078		
Px. 209	Certified Copy of GUCCI Trademark Registration		
	Number 1,093,769		
Px. 210	Certified Copy of GUCCI Trademark Registration Number 1,140,598		
Px. 211	Certified Copy of GUCCI Trademark Registration Number 1,168,477		
Px. 212	Certified Copy of GUCCI Trademark Registration		
Px. 213	Number 1,168,922		
PX. 213	Certified Copy of GUCCI Trademark Registration Number 1,169,019		
Px. 214	Certified Copy of GUCCI Trademark Registration		
	Number 1,200,991		
Px. 215	Certified Copy of GUCCI Trademark Registration		
	Number 1,202,802		
Px. 216	Certified Copy of GUCCI Trademark Registration Number 1,321,864		
Px. 217	Certified Copy of GUCCI Trademark Registration		
B 010	Number 1,340,599		
Px. 218	Certified Copy of GREEN-RED-GREEN Trademark		
Px. 219	Registration Number 1,122,780		
FX. 219	Certified Copy of GREEN-RED-GREEN Trademark		
Px. 220	Registration Number 1,123,224		- Contraction
FX. 220	Certified Copy of GREEN-RED-GREEN Trademark		
Px. 221	Registration Number 1,483,526		
FA. 221	Certified Copy of REPEATING GG Trademark		
Px. 222	Registration Number 2,680,237		
1 A. ZZZ	Certified Copy of REPEATING GG Trademark Registration Number 2, 072, 547		
Px. 223	Registration Number 3, 072,547		
* A. 443	Certified Copy of REPEATING GG Trademark Registration Number 3,072,549		
Px. 224	Certified Copy of the Trademark File Wrapper for		
4 Ch v harhar"T	JENNIFER DESIGNED BY JENNIFER GUCCI		ONLY A COLUMN
Name of the state	Application Number 76/228,124	***************************************	
	experience runned 70/220,124		

<u>Exhibit</u>	Description of Exhibit	Deposition Exhibit	
No. Px. 225		Reference	<u>Objections</u>
PX. 223	COLLEGIONE DI IED NIED CHARLE		
	COLLEZIONE DI JENNIFER GUCCI Application Number 75/446,501		
Px. 226			
1 A. 220	Certified Copy of the Trademark File Wrapper for COLLEZIONE DI JENNIFER GUCCI Application		
	Number 75/446,502		n iii.
Px. 227	Certified Copy of the Trademark File Wrapper for		
	GEMMA GUCCI Application Number 78/173,379		
Px. 228	Certified Copy of the Trademark File Wrapper for		
	GEMMA GUCCI Application Number 78/695,443		A.A.A.A.A.A.A.A.A.A.A.A.A.A.A.A.A.A.A.
Px. 229	Certified Copy of the Trademark File Wrapper for		
	REBEL GUCCI Application Number 78/695,464		
Px. 230	Group Exhibit of Gucci Catalogs		
Px. 231	Group Exhibit of Gucci Unsolicited Media Coverage		
Px. 232	Group Exhibit of Gucci Ads		
Px. 233	GUCCI BY GUCCI Book		
Px. 234	Group Exhibit of Business Week and Nielsen Reports		
Px. 235	Photographs of Louisville Bedding Product Packaging		
Px. 236	7/26/07 letter from B. Jaffe to L. Ederer regarding		
	Jennifer Gucci Hosiery Products		
Px. 237	7/30/07 Letter from L. Ederer to B. Jaffe regarding		
	Lawsuit		
Px. 238	7/30/07 Letter from B. Jaffe to L. Ederer regarding		
	Jennifer Gucci Hosiery Products		
Px. 239	7/31/07 Letter from E. Litwak to B. Jaffe regarding		
D 040	Termination of Jennifer Gucci license		
Px. 240	Nevada Corporation Status Sheet for Gemma Gucci	Px. 220	
D- 041	Wines, Inc.		
Px. 241	8/1/05 Email from E. Litwak to G. Gucci regarding	Px. 221	
Px. 242	license agreement		
FX. 242	Patrick Jones web page showing Gemma Gucci Wines	Px. 222	
Px. 243	bottle design		
1 1 1 243	Nevada Corporation Status Sheet for Gemma Gucci Eye Wear Inc.	Px. 223	
Px. 244			
1 1 2 7 7	Nevada Corporation Status Sheet for Gemma Gucci Coffee & Gelato, Inc.	Px. 224	
Px. 245	Nevada Corporation Status Sheet for Gemma Gucci	D 005	
	Gourmet Foods, Inc.	Px. 225	- Trinsend
Px. 246	Nevada Corporation Status Sheet for De Riera for	D- 226	
	Gemma Gucci Inc.	Px. 226	ATTENDED
Px. 247	Myspace pages showing Gemma Gucci handbag line	Px. 229	
Px. 248	11/19/07 Email from G. Gucci to E. Litwak regarding	Px. 230	
	Phoenix Fashion Week	FX. 43U	
Px. 249	12/11/07 Email from R. Sizemore to G. Gucci	Px. 232	
- • -	regarding licensing	i A. 434	
Px. 250	2/28/08 Letter from E. Litwak to V. Volpi regarding	Px. 238	
<u> </u>	buyout	1 A. 230	
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Exhibit No.	<u>Description of Exhibit</u>	Deposition Exhibit Reference	<u>Objections</u>
Px. 251	3/11/08 Email from E. Litwak to C. Judet regarding proposal	Px. 239	
Px. 252	Video of Gemma Gucci Handbag Show	Px. 228	
Px. 253	5/31/07 Email from J. Gucci to A. Cohen regarding toiletries	11. 220	
Px. 254	7/5/07 Email from D. Elan to J. Gucci regarding product samples		
Px. 255	11/11/07 Letter from R. Sizemore to E. Litwak regarding license		
Px. 256	11/12/07 Email from E. Litwak to R. Sizemore regarding letter		
Px. 257	12/3/03 License Agreement between Harrow Enterprises and Gemma Gucci Gourmet Food, Inc.		
Px. 258	12/3/03 License Agreement between E. Litwak and De Riera for Gemma Gucci Inc.		
Px. 259	Group exhibit of checks showing payment to E. Litwak and/or D. Lee from Gemma Gucci Gourmet Food Inc. and De Riera for Gemma Gucci, Inc.		
Px. 260	2/14/08 Email from E. Litwak to J. Macaluso regarding lawsuit against Gucci		
Px. 261	3/29/08 Email from J. Macaluso to G. Gucci regarding documents		
Px. 262	4/1/08 Email from G. Gucci to J. Macaluso regarding forged documents		
Px. 263	5/1/08 Letter to J. Macaluso from Arizona Attorney General's Office		

Dated: New York, New York

June 17, 2008

Respectfully submitted,

ARNOLD & PORTER LLP

By:

Louis S. Ederer (LE 7574) John Malthie (JM 3658)

399 Park Avenue

New York, New York 10022

(212) 715-1000

Attorneys for Plaintiff Gucci America, Inc.

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

GUCCI AMERICA, INC.,

Plaintiff,

Civil Action No. 07 CV 6820 (RMB)(JCF)

Defendants' Proposed Trial Exhibit List

JENNIFER GUCCI, JENCO DESIGNS, LLC, JENNICOR, LLC, JENNY GUCCI COFFEE AND GELATO COMPANY, INC., VERATEX, INC., COLLEZIONE DI CASA, INC., E.L. ERMANDEAD SEA COSMETICS CORP., ELE BRANDS ENTERPRISE, INC., GBN WATCH COLLECTION, INC., GBN GLOBAL BUSINESS NETWORK, EDWARD LITWAK d/b/a ED LITWAK & ASSOCIATES, GEMMA GUCCI, GEMMA GUCCI COFFEE AND GELATO COMPANY, INC., ABC CORPORATIONS 1-10, and JOHN DOES 1-10,

Defendants.

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Defendants JENNIFER GUCCI, JENNY GUCCI COFFEE AND GELATO COMPANY, INC., EDWARD LITWAK doing business as ED LITWAK & ASSOCIATES, and GEMMA GUCCI (the "Defendants"), by and through their attorneys, Harrington, Ocko & Monk, LLP, identify the following proposed trial exhibit list:

Defendants' Proposed Trial Exhibit No.	Document Description	
1	Gucci Wars, by Jennifer Gucci (2008)	
2	Gucci: A House Divided, by G. McKnight(1987)	
3	The House of Gucci, by S. Forden (2000)	
4	Daily Express Article, dated June 9, 1981	
5	Hartford Courant Article, May 29, 1981	
6	February 12, 1982 Article, and February 14, 1982 Invitation	
7	Woman Today Article, October 6, 1986	
8	West Australian Article, December 2, 1989	
9	Sunday Express Article, June 17, 1990	

Defendants' Proposed Trial Exhibit No.	Document Description	
10	Judge Conner's June 17, 1988 Decision, Plt. Dep. Exh. 16	
11	Judge Conner's July 13, 1988 Decision, Plt. Dep. Exh. 15	
12	Judge Conner's Jan. 13, 1994 decision, Plt. Dep. Exh. 17	
13	Paolo Gucci Int. Hotels, Ltd documents	
14	NY Times Article, April 1994, Plt. Dep. Exh. 93	
15	NY Post Article, Nov. 13, 1992	
16	Daily Telegraph Article, Oct. 16, 1995	
17	Daily News Article, Sept. 10, 1995	
18	NY Post Article, March 29, 1993	
19	Daily News Article, Dec. 4, 1991	
20	Hello Magazine Article, July 17, 1993	
21	New York Observer Article, Oct. 2, 1995	
22	Daily Telegraph Article, Oct. 18, 1995	
23	License Agreement, Plt. Dep.Exh. 3	
24	DVD of 2000 German Television Show of J. Gucci	
25	Decision, Regional Court, Hamburg Germany, April 19, 2000 Plt. Dep. Exh. 212	
26	Joint Venture Agreement, Plt. Dep. Exh. 165	
27	Assignment Agreement, Plt. Dep. Exh. 166	
28	Agreement, March 3, 2000, Plt. Dep. Exh. 12	
29	Sketches, Plt. Dep. Exh. 213	
30	Emails from Gemma Gucci, Plt. Dep. Exh. 234	
31	Emails from Gemma Gucci, Plt. Dep. Exh. 235	
32	Email from Gemma Gucci, Plt. Dep. Exh. 183	
33	Litwak Facsimile, Plt. Dep. Exh. 20	
34	Litwak Letter to Cohen, Plt. Dep. Exh. 21	
35	Press Release dated Feb. 2007, Plt. Dep. Exh. 30	
36	Pictures, Plt. Dep. Exh. 18	
37	Email April 30, 2007, Plt. Dep. Exh. 41	
38	Email March 6, 2007, Plt. Dep Exh. 40	
39	License Agreement, Plt. Dep. Exh. 68	
40	Email from J. Gucci, Plt. Dep. Exh. 69	
41	Pictures, Plt. Dep. Exh. 74	
42	Pictures, Plt. Dep. Exh. 75	
43	Pictures, Plt. Dep. Exh. 76	
44	Pictures, Plt. Dep. Exh. 78	

Defendants' Proposed Trial Exhibit No.	Document Description	
45	H Magazine Article, Aug. 2003	
46	Photo Brochure for Rupert Jacino	
47	You Magazine Article, Feb. 24, 2008	
48	Master License, Plt. Dep. Exh. 6	
49	License Agreement, Plt. Dep. Exh. 8	
50	Gucci Movie Project Proposal, Plt. Dep. Exh. 13	
51	Rights Agreement, Plt. Dep. Exh. 14	
52	Email from Marc Yeh, Plt. Dep. Exh. 34	
53	Proposal for TV Show Rebel Gucci, Plt. Dep. Exh. 172	
54	Outline for TV Show Rebel Gucci, Plt. Dep. Exh. 173	
55	Letter or terms, Plt. Dep. Exh. 174	
56	Draft letter regarding Rebel Gucci TV Show, Plt. Dep. Exh.	
57	Litwak Email, Plt. Dep. Exh. 179	
58	Litwak Email, Plt. Dep. Exh. 180	
59	Gemma Gucci Email, Plt. Dep. Exh. 181	
60	Litwak Letter, Plt. Dep. Exh. 188	
61	License Agreement, Plt. Dep. Exh. 189	
62	Litwak Letter, Plt. Dep. Exh. 192	
63	Business Expense Summary, Plt. Dep. Exh. 195	
64	Litwak Email, Plt. Dep. Exh. 198	
65	Litwak Letter, Plt. Dep. Exh. 199	
66	Gemma Gucci Coffee Scope of Work, Plt. Dep. Exh. 201	
67	Litwak Letter, Plt. Dep. Exh. 205	
68	NY Times Article, Oct. 14, 1995, Plt. Dep. Exh. 94	
69	File Wrapper for Trademark Application, Plt. Dep. Exh. 97	
70	Email from J. Gucci, Plt. Dep. Exh. 100	
71	Presentation for Collezionne Di Casa, Plt. Dep. Exh. 144	
72	Email from M. Pino, Plt. Dep. Exh. 149	
73	Email from M. Pino, Plt. Dep. Exh, 157	
74	Emails from M. Pino, Plt. Dep. Exh. 158	
75	M. Pino Emails, Plt. Dep. Exh. 160	
76	J. Gucci Email, Plt. Dep. Exh. 72	
77	M. Pino Email, Plt. Dep. Exh, 83	
78	M. Pino Email, Plt. Dep. Exh. 84	
79	M. Pino Email, Plt. Dep. Exh. 85	

Defendants' Proposed Trial Exhibit No.	Document Description	
80	Letter from B. Jaffe, Plt. Dep. Exh. 92	
81	Email to A. Cohen, Plt. Dep. Exh. 49	
82	Email to A. Cohen, Plt. Dep. Exh. 50	
83	Litwak Email, Plt. Dep. Exh. 51	
84	Elan Email, Plt. Dep. Exh. 53	
85	Sublicense Agreement, Plt. Dep. Exh. 61	
86	M. Pino Email, Plt. Dep. Exh. 115	
87	M. Pino Email, Plt. Dep. Exh. 122	
88	M. Pino Email, Plt. Dep. Exh. 127	
89	Express Sunday Article, October 27, 1996	
90	Plt. Dep. Exh. 210	

1. Defendants reserve the right to supplement their proposed Trial Exhibit List prior to the trial of this matter, subject to the Court's Orders.

Dated: White Plains, New York June 17, 2008

HARRINGTON, OCKO & MONK, LLP

By: s/John T. Rosenthal

Kevin J. Harrington [KH-5027]

John T.A. Rosenthal [JR-4819]

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Jenny Gucci Coffee and Gelato Company,

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

GUCCI AMERICA, INC.,

Plaintiff,

-----x

- against -

JENNIFER GUCCI, JENCO DESIGNS, LLC, JENNICOR, LLC, JENNY GUCCI COFFEE AND GELATO COMPANY, INC., VERATEX, INC., COLLEZIONE DI CASA, INC., E.L. ERMAN -DEAD SEA COSMETICS CORP., ELE BRANDS ENTERPRISE, INC., GBN WATCH COLLECTION, INC., GBN GLOBAL BUSINESS NETWORK, EDWARD LITWAK d/b/a ED LITWAK & ASSOCIATES, GEMMA GUCCI. GEMMA GUCCI COFFEE AND GELATO COMPANY, INC., ABC CORPORATIONS 1-10. and JOHN DOES 1-10.

Defendants.

Civil Action No. 07 cv 6820 (RMB) (JCF)

EXHIBIT C

PLAINTIFF'S DEPOSITION DESIGNATIONS

Plaintiff Gucci America, Inc. ("Gucci") hereby provide the following deposition designations that Gucci intends to use at trial. Gucci reserves the right to supplement these designations.

GEMMA GUCCI'S MARCH 21, 2008 DEPOSITION

Gucci's Designations	Defendants' Counter-Designations
3:9-13	
11:10-23	
13:2-20	
19:23 — 20:8	
20:9 — 22:19	
23:7-9	
23:10 — 24:16	
27:6-10	
27:24 — 28:6	
35:11-15	
36:15 — 38:8	
38:18 — 42:15	
45:24 — 46:6	
48:8-19	·
49:11 — 50:22	
51:11-22	
55:16 — 58:3	
58:11 — 62:14	
63:6-9	
65:25 — 66:9	
67:2-9	
67:21 — 69:9	
70:17-23	
70:24-25	
74:7 — 75:11	

Gucci's Designations	Defendants' Counter-Designations
77:11-24	
78:10 — 80:7	
82:10 — 83:19	
83:20 — 84:18	
85:2-15	
86:20-23	
87:18-25	
88:10 — 89:7	
90:15 — 91:8	
92:9-13	
92:22 — 93:2	
93:24 — 94:5	
94:6 — 95:15	
96:12-17	
97:4-11	
97:18 — 99:18	
99:19 — 100:10	
100:16 — 102:11	
102:12-22	
103:4-22	
104:5-9	
104:24 — 105:18	
105:19-22	
106:24 — 107:2	
107:23 — 108:25	
109:2-10	
109:18-21	
110:4 — 17	
110:25 — 112:5	
112:9-14	

Gucci's Designations	Defendants' Counter-Designations
112:15 — 113:6	
113:7 — 115:10	
116:7 — 118:12	
118:13 — 119:6	
120:3 — 121:11	
121:12 — 122:15	
122:16-20	
126:17 — 128:12	
128:22 — 129:2	
131:17 — 134:22	
135:5-11	
140:15 — 142:17	
142:23 — 143:13	
144:6-10	
145:10 — 146:15	
150:23 — 151:23	
153:9-12	
154:12-19	
158:2-8	
158:21-24	
159:13-20	
160:24 — 161:11	
164:9-24	
165:4-24	
166:25 — 167:14	
167:22-25	
168:17 — 170:9	
170:20 — 171:5	
171:18-24	
172:9 — 174:13	

Gucci's Designations	Defendants' Counter-Designations
175:16 — 176:3	
176:13-16	
176:21 — 177:16	

SANDY CHO'S MARCH 13, 2008 DEPOSITION

Gucci's Designations	Defendants' Counter-Designations
6:17 -20	
9:14 — 10:2	
11:3-6	
12:17-18	
13:19-22	
14:1-12	
16:3-25	
17:12 — 19:13	
20:9-17	
21:5-15	
26:11 — 29:11	
29:12 — 31:14	
32:6-10	
33:12-18	
37:23 — 39:10	
44:16-22	
48:9-13	
51:13 — 53:3	
53:17-23	
58:4-17	

ED LITWAK'S SEPTEMBER 17, 2007 DEPOSITION

Gucci's Designations	Defendants' Counter-Designations
14:9 — 15:7	

Gucci's Designations	Defendants' Counter-Designations
183:13 — 186:3	
212:5 — 214:10	
214:11 — 215:17	
215:20 — 217:15	

JENNIFER GUCCI'S OCTOBER 12, 2007 DEPOSITION

Gucci's Designations	Defendants' Counter-Designations
8:9-17	
8:18 — 9:16	
9:17 — 10:2	
10:3-9	
10:10 — 11:4	
11:5-18	
12:9-25	
13:8 — 14:8	
17:22-24	
17:25 — 18:14	
18:15 — 19:18	
19:19 — 20:11	
56:5 — 58:16	
58:17 — 63:12	
63:13 — 66:3	
66:9 — 68:22	
70:9 — 71:23	
72:12 — 73:4	
89:9 — 96:7	
118:7-24	
125:17 — 131:16	
144:23 — 146:18	,
146:19 — 151:6	
162:24 — 165:13	

Gucci's Designations	Defendants' Counter-Designations
186:18 — 187:18	
189:25 — 193:6	
193:7 — 195:2	-
195:3-14	
195:15 — 196:21	
196:22 — 198:7	
198:8-19	
198:20 — 199:8	
208:14 — 209:20	
214:15-17	

ED LITWAK'S MARCH 13, 2008 DEPOSITION

Gucci's Designations	Defendants' Counter-Designations
15:3 — 17:25	
18:6 — 19:6	
20:18 — 22:8	
40:14 — 43:4	
43:22 — 46:1	
46:6-25	
57:22 — 60:3	
75:1 — 77:22	
80:7 — 81:5	
81:6 — 87:17	
92:23 — 95:11	
95:12 — 97:3	
97:23 — 100:6	
100:8 — 103:9	

Dated: New York, New York

June 17, 2008

Respectfully submitted,

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